

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

<p><b>IN RE: CENTURYLINK SALES PRACTICES AND SECURITIES LITIGATION</b></p> <p>This Document Relates to: 17-2832, 17-4613, 17-4614, 17-4615, 17-4616, 17-4617, 17-4618, 17-4619, 17-4622, 17-4943, 17-4944, 17-4945, 17-4947, 17-5001, 17-5046, 18-1573, 18-1572, 18-1565, 18-1562</p>	<p><b>MDL No. 17-2795 (MJD/KMM)</b></p> <p><b>PLAINTIFFS' MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT AND PROVISIONAL CLASS CERTIFICATION</b></p>
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Pursuant to Rule 23(e) of the Federal Rules of Civil Procedure, Plaintiffs hereby move this Court for entry of an Order: (1) granting Preliminary Approval of the Settlement; (2) provisionally certifying the proposed Settlement Class; (3) conditionally appointing the proposed Class Representatives as the Settlement Class Representatives; (4) conditionally appointing the proposed Class Counsel as the Settlement Class Counsel; (5) approving the form and manner of notice, (6) ordering that notice be disseminated to the Settlement Class; (6) establishing the deadlines for Settlement Class Members to request exclusion from the Settlement Class, file objections to the Settlement, or file Claims for a Settlement Award; and (7) setting the proposed schedule for completion of further settlement proceedings, including scheduling the final fairness hearing.

This Motion is based upon the record in this case as well as the: (1) Memorandum of Law in Support of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement and Provisional Class Certification; (2) Declaration of Brian C. Gudmundson

In Support of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement and Provisional Class Certification; (3) Declaration of Layn R. Phillips; (4) Declaration of Shannon R. Wheatman, Ph.D., on Adequacy of Notices and Proposed Notice Program; and, (4) Declaration of Tiffaney A. Janowicz in Support of Motion for Preliminary Approval of Class Action Settlement, as well as any additional materials and argument that may be presented to the Court.

Dated: October 16, 2019

Respectfully submitted,

s/ Brian C. Gudmundson

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